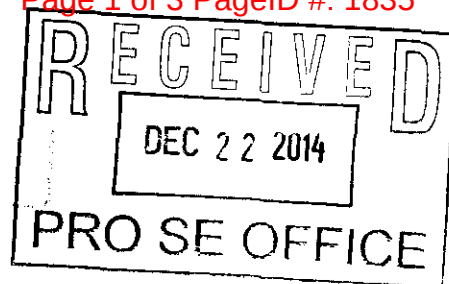


**CONRAD R. WILLIAMS, MD**  
INTERNAL MEDICINE/GENERAL PRACTICE

255 EASTERN PARKWAY  
Brooklyn, NY 11238

718-636-8291  
FAX: 718-636-8667  
CRW1115@aol.com

ORIGINAL



~~December 18, 2014~~

*December 22, 2014 erw*

To: the Hon. Raymond J. Dearie

United States District Judge

Re: Allstate insurance Co. against Conrad Robert Williams et al.

Docket number: 13-CV-2893 (RJD)

Dear Sir,

I am hereby requesting that a stay be granted in the case of the default judgment against myself and Targee Medical Services PC on the grounds that I have filed an appeal in this case. My appeal was filed on December 17, 2014. I request there any further decisions in this case be postponed until after the final determination is made on my appeal. In addition I am requesting the granting of a stay or possibly an adjournment of the subpoena that I have received regarding this case, requiring me to appear on January 8, 2014 at the offices of Rivkin Radler, LLP at 926 RXR Plaza in Uniondale, New York on the grounds that my appeal has not yet been adjudicated and furthermore that the conditions placed upon me in by the subpoena are excessively burdensome and impossible to satisfy given the short time granted by the subpoena. The terms of the subpoena will require much more time to comply with then the timeframe that has been allowed here. At this point I'm not even certain that I will be able to locate and produce all the documents requested in the subpoena as many if not all were lost as a result of the inundation of Targee Medical Services, PC that occurred as a result of Hurricane Sandy. Specifically:

1. Copies of all checks drawn on any account held by myself or by Targee Medical Services, PC
2. Copies of all checks drawn on any other account tendered to me or any entity owned or controlled by me in payment of any professional or other services or charges incurred by the judgment debtors,
3. Copies of any of the documents evidencing payment to myself or any entity owned by me,

4. Copies of any contract agreements, notes and/or obligations from the period January 1, 2007 through the present.
5. The federal and state tax return from the period of January 1, 2007 through the present.
5. General ledgers for the judgment debtors, Accounts receivable and journals, related to transactions that generated cash or currency,
6. Bank records including copies of all the withdrawal slips, canceled checks, transaction statements, electronic fund transfers, wire transfers, Ledgers for the period January 1, 2007 to the present.
7. Documents relating to every agreement, transactional payment between any of the judgment debtors and any other judgment debtor from January 1, 2007 to present.,
8. Documents relating to any agreements with any person or entity that provided tax-preparation or legal services on behalf of the judgment debtors and
9. Documents relating to ownership or lease of any equipment by the judgment debtors.

My reason for objecting to these requirements as overly burdensome are:

1. Locating copies of all checks, (front and back) require me to contact the banks in question and request at peace. This process at will require much more time than has been allotted me in the subpoena as subpoena required her to appear with all of these records by January 8. In addition the fees for copies of the the bank checks in question are likely to be substantial enough to cause significant hardship for me.
2. I'm in the process of preparing tax returns from 2011 through 2013. I will have copies of the tax returns from 2007 through 2010 however the remaining tax returns will not be available for some time as my accountant has just begun to work on them.
3. The letters, journals and other transaction records that have been requested were destroyed in the flood after Hurricanes Sandy at Targee Medical Services. That office, formerly located at 460 Midland Ave. in the South Beach section of Staten Island, NY, was inundated by 6 feet of water and totally destroyed. Because it was not covered by flood insurance, Targee Medical Services, PC was forced to cease operations. It was never able to be reopened.

Again, because of the reasons stated above I am requesting that a stay of the subpoena be granted until a decision is made regarding my appeal. Meanwhile I intend to make a good-faith effort to obtain as many of the documents requested in the subpoena as possible however I will require additional time in order to do so. I am enclosing photos of the damage incurred at Targee Medical Services, PC in the aftermath of Hurricane Sandy.

Respectfully,

A handwritten signature in black ink, appearing to read "Conrad R. Williams". The signature is fluid and cursive, with the first name "Conrad" being more legible than the last name "Williams".

Conrad R. Williams, M.D.